



Filed Electronically Via ECFS 1/8/2016

EB DOCKET NO. 06-36

January 8, 2016

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**Reference: Annual 47 C.F.R. § 64.2009(e), EB Docket 06-36, Certification of CPNI Filing of Blackfoot Telephone Cooperative, Inc.**

Dear Ms. Dortch:

Enclosed is the annual CPNI compliance certificate of Blackfoot Telephone Cooperative, Inc. (499 Filer ID 803277).

Please contact me with any questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads "Michelle Owens". The signature is fluid and cursive, with the first and last names clearly legible.

Michelle Owens  
Carrier and Regulatory Specialist  
Phone: 406-541-5131  
E-mail: [mowens@blackfoot.com](mailto:mowens@blackfoot.com)

Blackfoot Telephone Cooperative, Inc.  
1221 North Russell Street, Missoula, MT 59808 | 866-541-5000 | [www.blackfoot.com](http://www.blackfoot.com)  
CPNI Certification and Statement

January 8, 2016

Blackfoot Telephone Cooperative

Blackfoot Communications

Fremont Communications

TeleSphere Software

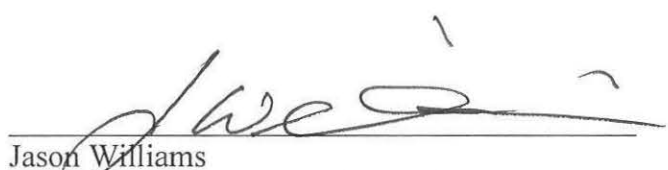
Before the  
Federal Communications Commission  
Washington, D.C. 20554

CPNI Compliance Certification )  
As Required by FCC Enforcement )  
Bureau, DA 10-91 )

**EB Docket No. 06-36**  
Blackfoot Telephone Cooperative, Inc.  
499 Filer ID 803277

**BLACKFOOT TELEPHONE COOPERATIVE, INC.  
ANNUAL 47 C.F.R. § 64.2009(E) CERTIFICATION OF CPNI COMPLIANCE  
FOR THE 2015 CALENDAR YEAR**

1. Blackfoot Telephone Cooperative, Inc. ("BTC") (499 Filer ID 803277) is submitting its annual compliance certificate in as required in EB Docket No. 06-36, pursuant to section 64.2009(e) of the Federal Communication Commission's rules.
2. I am the Vice President – General Counsel, for BTC. I make this certification from my personal knowledge of the CPNI procedures and policies of BTC.
3. BTC expects to use CPNI for marketing purposes and has noticed customers under the "opt-out" provisions of the rules. BTC's use of CPNI is and will be done in strict compliance with the principles and requirements outlined in Subtitle U of the Commission's rules. Accordingly, BTC's personnel are trained in the proper use of CPNI for such purposes. Because CPNI will be used for marketing purposes, BTC has established the appropriate safeguards for this type of use of CPNI data. These safeguards include documentation of this policy in company procedures and training of company personnel with regard to use of CPNI data.
4. On behalf of BTC, I certify that to the best of my knowledge, pursuant to the Commission's rules, BTC has established procedures that are adequate to ensure compliance with CPNI rules currently in effect and the statements contained in this filing are correct.



Jason Williams  
Vice President – General Counsel

Blackfoot Telephone Cooperative, Inc.  
CPNI Certification and Statement  
January 8, 2016

Before the  
Federal Communications Commission  
Washington, D.C. 20554

CPNI Compliance Certification )  
As Required by FCC Enforcement )  
Bureau, DA 10-91 )

**EB Docket No. 06-36**  
Blackfoot Telephone Cooperative, Inc.  
499 Filer ID 803277

**BLACKFOOT TELEPHONE COOPERATIVE, INC.**  
**ANNUAL 47 C.F.R. § 64.2009(E) CERTIFICATION OF CPNI COMPLIANCE**  
**FOR THE 2015 CALENDAR YEAR**

**OPERATING PROCEDURES STATEMENT**

1. Customer account prominently displays “CPNI” so that Customer Sales and Service Representatives (CSSRs) can readily identify customers opting to restrict use of their CPNI. When calls are received by CSSRs from customers they ask for customer permission to access account information.
2. Customers are given an opportunity to “opt-out” of CPNI usage beginning with the install of service. Additionally, customers may “opt-out” at any time.
3. Notice regarding customer CPNI rights and BTC’s duty to protect CPNI is provided to all new and existing customers in the printed telephone directory. In addition, the notice is also printed once every two years as a message on the customer’s billing statement.
4. Employees are trained on the proper use and/or disclosure of CPNI. Additionally procedures are documented and readily available to all employees on the company’s internal website.
5. Access to CPNI data is limited to employees and/or entities with proper authorization as allowed under Commission rules. All employees and/or entities with such access operate under policies and/or contract requiring nondisclosure of confidential information.
6. All marketing campaigns and materials are reviewed by a supervisory panel. This will include any use of CPNI data used in any given marketing effort. Please note that as of this time BTC has not used CPNI data in this manner but the proper safeguards are in place should it be used.

7. Improper use or disclosure of CPNI is subject to BTC's work rules and disciplinary policies as outlined in its policy manual. The policy manual is readily accessible by all employees.

8. Valid Photo Identification is required when customers come into the business office requesting assistance/access to any account information.

9. Call detail is only provided in a customer initiated call where the customer identifies the call record consistent with the FCC 07-22. Absent that information call detail will not be released during a customer initiated call. BTC employees have been instructed to either mail the detail to the address of record or refer the customer to the e-bill site.

10. BTC does not currently, and has no plans to provide CPNI to a third party for the purposes of marketing.

11. Customer initiated changes in passwords or addresses result in a generic notification to the customer using the address of record consistent with FCC rules.

12. On-line access to CPNI is compliant with the FCC password requirements.

Before the  
Federal Communications Commission  
Washington, D.C. 20554

CPNI Compliance Certification     )  
As Required by FCC Enforcement   )  
Bureau, DA 10-91                    )

**EB Docket No. 06-36**  
Blackfoot Telephone Cooperative, Inc.  
499 Filer ID 803277

**BLACKFOOT TELEPHONE COOPERATIVE, INC.**  
**ANNUAL 47 C.F.R. § 64.2009(E) CERTIFICATION OF CPNI COMPLIANCE**  
**FOR THE 2015 CALENDAR YEAR**

**CUSTOMER COMPLAINTS**

1.     There were no reported CPNI breaches during the 2015 calendar year.

Before the  
Federal Communications Commission  
Washington, D.C. 20554

CPNI Compliance Certification     )  
As Required by FCC Enforcement    )  
Bureau, DA 10-91                    )

**EB Docket No. 06-36**  
Blackfoot Telephone Cooperative, Inc.  
499 Filer ID 803277

**BLACKFOOT TELEPHONE COOPERATIVE, INC.**  
**ANNUAL 47 C.F.R. § 64.2009(E) CERTIFICATION OF CPNI COMPLIANCE**  
**FOR THE 2015 CALENDAR YEAR**

**PRETEXTING ACTIVITIES**

1.     During the 2015 calendar year no pretexting activities were noted, so no actions were undertaken to address such activities.